

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

BETH SHAPIRO, LORI ANN LOMBARDI, and  
HEATHER GITLIN, on behalf of themselves and  
on behalf of all others similarly situated,

Plaintiffs,

v.

AETNA, INC. and AETNA LIFE INSURANCE  
COMPANY,

Defendants.

Civil Action No. 2:22-cv-01958-ES-AME

**STIPULATION AND CONSENT ORDER  
EXTENDING TIME TO RESPOND TO  
COMPLAINT AND SETTING BRIEFING  
SCHEDULE FOR MOTION TO DISMISS**

**WHEREAS**, Beth Shapiro, Lori A. Lombardi, and Heather Gitlin (collectively “Plaintiffs”), filed the Complaint in the above captioned matter in the United States District Court for the District of New Jersey on April 5, 2022; and

**WHEREAS**, Plaintiffs served the Complaint on Defendants Aetna Inc. and Aetna Life Insurance Company (“Defendants”), on April 20, 2022; and

**WHEREAS**, Defendants’ time to respond to Plaintiffs’ Complaint expires on May 25, 2022; and

**WHEREAS**, Defendants anticipate filing a motion to dismiss and need additional time to review the pleadings and the relevant materials, as well as the applicable law, in order to prepare such a motion; and

**WHEREAS**, counsel for Defendants has conferred with counsel for Plaintiffs, who consents to Defendants’ request for additional time to respond to the Complaint and to the briefing schedule proposed below; and

**WHEREAS**, Defendants previously received a 14 day extension of time to respond to the Complaint pursuant to Local Civil Rule 6.1(b);

**THEREFORE**, it is hereby **STIPULATED AND AGREED**, by and between the parties and their undersigned counsel, that (a) the deadline for Defendants to move to dismiss or otherwise respond to the Complaint is extended to July 22, 2022; (b) the deadline Plaintiffs to file their opposition or response to Defendants' motion to dismiss the complaint is September 22, 2022; and (c) the deadline for Defendants to file a reply in further support of their motion to dismiss the complaint is October 21, 2022.

**AGREED TO AS TO FORM AND SUBSTANCE**

Dated: May 20, 2022

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SO ORDERED.

Dated: \_\_\_\_\_, 2022  
Newark, New Jersey

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Hon. Esther Salas, U.S.D.J.